

RQ-2

April 15, 2015

KATE COYNE-MCCOY, TREASURER AMERICAN LEADHERSHIP PAC 267 GLEANER CHAPEL ROAD NORTH SCITUATE, RI 02857

IDENTIFICATION NUMBER: C00546598

Response Due Date 05/20/2015

REFERENCE: 30 DAY POST-GENERAL REPORT (10/01/2014 - 11/24/2014)

## Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. Failure to adequately respond by the response date noted above could result in an audit or enforcement action. Additional information is needed for the following 2 item(s):

- 1. Schedule B of your report discloses reimbursements to individuals for "Reimbursement." Please be advised that when itemizing reimbursements to individuals for goods or services, if the payment to the original vendor aggregates in excess of \$200 in a calendar year, a memo entry including the name and address of the original vendor, as well as the date, amount and purpose of the original purchase must be provided. Please amend your report to include the missing information and clearly identify on the Schedule B, which reimbursement each memo entry relates to. If itemization is not necessary, you must indicate so in an amendment to this report. 11 CFR §\$104.3(b)(3)(i) and 104.9, and Advisory Opinions 1992-1 and 1996-20, footnote 3
- 2. On Schedule B supporting Line 29, you have itemized disbursements for which you have failed to include the purpose. Please amend your report to include the missing information. (11 CFR § 104.3(b)(3))
- Schedule B of your report discloses expenditures for "Media Expenses." For your information and consideration when preparing future filings, if a portion or all of these expenditures were for public communications (as defined by 11 CFR §100.26) containing express advocacy as defined under 11 CFR §100.22, this would constitute an independent expenditure and would be disclosed on a Schedule E supporting Line 24. Public communications that refer to a clearly identified Federal candidate, but that do not expressly advocate the election or

## AMERICAN LEADHERSHIP PAC

Page 2 of 2

defeat of that candidate would be reported on Schedule B for Line 21(b) of the Detailed Summary Page.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. Requests for extensions of time in which to respond will not be considered.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1162.

Sincerely,

David Butler

Senior Campaign Finance Analyst

Reports Analysis Division